

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

In Re: Brian F. Fenelon	Case Number 19-11809-JEB Chapter 13
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**JOINT NOTICE AND REQUEST FOR APPROVAL TO WITHDRAW
APPEARANCE AND ENTRY OF APPEARANCE OF SUBSTITUTION COUNSEL**

NOTICE IS HEREBY GIVEN that subject to the approval of this Honorable Court, Attorney Marcus E. Pratt ("Attorney Pratt") hereby substitutes Attorney Zoh Nizami ("Attorney Nizami") as counsel of record in the above-captioned matter.

Attorney Pratt represents that an appearance has been filed in this case on behalf of Wells Fargo Bank, N.A., as Trustee for Carrington Mortgage Loan Trust, Series 2006-FRE2 Asset-Backed Pass-Through Certificates ("Secured Creditor") by Attorney Nizami while employed by Korde & Associates, P.C. (the "Korde Firm"). This notice is being filed for the purpose of replacing Attorney Nizami on the appearance list to the extent appropriate.

Pursuant to MLBR 9010-3(a) and as applicable, both undersigned attorneys further certify as follows:

- 1) there are no pending motions before the Court, or the listed creditor is not a party to the pending motions before the Court;
- 2) no trial date has been set or the listed creditor is not a party to the trial; and
- 3) no hearings or conferences are scheduled, and nor are reports, oral or written from the listed creditor.

FURTHER, NOTICE IS HEREBY GIVEN that subject to further order of this Court, Attorney Marcus E. Pratt shall be deemed to have entered his appearance in this case and all notices, pleadings, and/or correspondence should be directed to:

Marcus E. Pratt, Esquire
Korde & Associates, P.C.
900 Chelmsford Street, Suite 3102
Lowell, MA 01851
Tel: (978) 256-1500
bankruptcy@kordeassociates.com

DATED: September 22, 2020

Respectfully Submitted,

/s/ Marcus Pratt

Marcus Pratt, Esquire
BBO #684610

Korde & Associates, P.C.
900 Chelmsford Street, Suite 3102
Lowell, MA 01851
Tel: (978) 256-1500
bankruptcy@kordeassociates.com

/s/ Zoh Nizami
Zoh Nizami, Esquire
BBO #697116
Harmon Law Offices, P.C.
P.O. Box 610389
Newton Highlands, MA 02461-0345
Tel: (781) 292-3900
mabk@harmonlaw.com

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ATTORNEY CERTIFICATIONS

I, Attorney Marcus E. Pratt, hereby enter my appearance on behalf of the identified creditor which is/was represented by the withdrawing attorney in this case.

/s/ Marcus Pratt
Marcus Pratt, Esquire
BBO #684610
Korde & Associates, P.C.
900 Chelmsford Street, Suite 3102
Lowell, MA 01851
Tel: (978) 256-1500
bankruptcy@kordeassociates.com

I, Attorney Zoh Nizami, subject to Court approval, hereby withdraw my appearance on behalf of the identified creditor in this case.

/s/ Zoh Nizami
Zoh Nizami, Esquire
BBO #697116
Harmon Law Offices, P.C.
P.O. Box 610389
Newton Highlands, MA 02461-0345
Tel: (781) 292-3900
mabk@harmonlaw.com

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**ORDER APPROVING WITHDRAWAL OF APPEARANCE
AND ENTRY OF APPEARANCE OF SUBSTITUTION COUNSEL**

Attorneys Marcus E. Pratt and Zoh Nizami having filed a *Joint Notice and Request for Approval to Withdraw Appearance and Enter Appearance of Substitute Counsel*, and both attorneys having certified, as applicable, that in such case:

- 1) there are no pending motions before the Court, or the listed creditor is not a party to the pending motions before the Court;
- 2) no trial date has been set or the listed creditor is not a party to the trial; and
- 3) no hearings or conferences are scheduled, and nor are reports, oral or written from the listed creditor.

It is hereby ORDERED that Attorney Zoh Nizami shall be withdrawn as counsel on behalf of the identified creditor. If Attorney Marcus E. Pratt does not already have an appearance on behalf of the identified creditor, an appearance of Attorney Marcus E. Pratt shall be deemed to have been entered on behalf of such creditor by virtue of this Order.

Dated: _____

Honorable _____
U.S. Bankruptcy Judge

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CERTIFICATE OF SERVICE

I, Marcus Pratt, Attorney for **Wells Fargo Bank, N.A., as Trustee for Carrington Mortgage Loan Trust, Series 2006-FRE2 Asset-Backed Pass-Through Certificates** hereby certify that on September 22, 2020 I electronically filed the foregoing *Joint Notice and Request for Approval to Withdraw Appearance and Enter Appearance of Substitute Counsel* with the United States Bankruptcy Court for the District of MA using the CM/ECF System. I served the foregoing documents on the following CM/ECF participants:

John Fitzgerald, Assistant U.S. Trustee
Carolyn Bankowski, Trustee
Brian R. Lewis, Esquire

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non-CM/ECF participants:

Brian F. Fenelon
45 Tower Avenue
South Weymouth (Weymouth), MA 02190

/s/ Marcus Pratt
Marcus Pratt, Esquire
BBO #684610
Korde & Associates, P.C.
900 Chelmsford Street, Suite 3102
Lowell, MA 01851
Tel: (978) 256-1500
bankruptcy@kordeassociates.com